

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

MARK HOFFMAN, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

**BIZFUND, LLC D/B/A
ROYAL FUNDING GROUP**

Defendant.

Case No. 25-cv-2186

CLASS ACTION

JURY TRIAL DEMANDED

**PLAINTIFF’S UNOPPOSED MOTION TO
CONTINUE THE TELEPHONIC INITIAL CONFERENCE**

Plaintiff Mark Hoffman (“Plaintiff” or “Mr. Hoffman”) with the consent of the Defendant BizFund, LLC d/b/a Royal Funding Group requests that the Court’s Initial Conference, currently scheduled to be held on June 25, 2025 be continued for at least 90 days to allow the parties to issue subpoenas that will identify the correct defendant. In further support thereof, the Plaintiff states that shortly after the complaint was served on the Defendant, counsel for the Defendant contacted Plaintiff’s counsel denying that Defendant owns the telephone number at issue and further clarifying that the Defendant’s business has been subject to impersonation attempts. To clarify the involvement of Defendant, and to identify the actual caller at issue, Defendant has consented to issuance of subpoenas. Such subpoenas have been issued and are currently awaiting response. Plaintiff respectfully requests a 90-day extension to finalize the subpoena process on telephone vendors and amend the complaint if necessary.

Counsel for the Plaintiff has conferred with counsel for the Defendant, who consent to this relief.

RESPECTFULLY SUBMITTED AND DATED this 15th day of June, 2025.

PLAINTIFF, on behalf of himself
and others similarly situated,

/s/ Anthony I. Paronich
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